

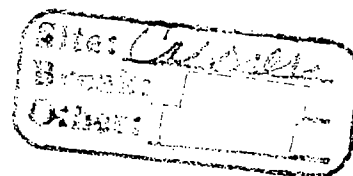


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

YELLOW



April 4, 1990

Ms. Marti Shanks
B&V Waste Science and Technology Corp.
230 West Monroe, Suite 2250
Chicago, Illinois 60606

Dear Ms. Shanks,

In review of the draft Work Plan and per our previous phone discussions we are anticipating the submittal of a revised Work Plan regarding the Level of Effort and Costs. Revisions to the tasks should also be made. For example:

BVWST will be responsible for two fact sheets, rather than three, one for the kick-off meeting and one for the proposed plan.

BVWST will not be responsible for the following:

A public meeting at the end of the RI.
A ROD public notice.
Placing newspaper ads other than the RI kick-off meeting.
Maintaining the information repository.

In review of the Community Relations Plan, some questions I have are:

Are there copying facilities available for citizens' use?
Are there costs associated with the copying?
Are the repository and the public meeting facilities handicap accessible?
Were there any citizens living near the site?
Is there a separate mailing list for the everyday citizen? If so, please provide this information, separate from the Community Relations Plan, to me.

Enclosed are specific comments made on the following documents:

- 1) The Draft Community Relations Plan
- 2) The Draft RI/FS Kickoff Fact Sheet
- 3) The Public Notice



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The tentatively scheduled public meeting date is the week of April 16th, 1990. Please contact me after you have reviewed these comments so that we can formalize the details regarding the public meeting.

Please call me at (404) 347-7791 if you have any questions.

Sincerely,

Elizabeth A. Brown
Remedial Project Manager

cc: Jane Penny, Dynamac
Ken Myer, U.S. EPA

Enclosure

1.) COMMENTS ON THE DRAFT COMMUNITY RELATIONS PLAN

I. SITE DESCRIPTION AND HISTORYPage 3, Paragraph 4, Subparagraph 1

- o This subparagraph should be revised to state:

In 1972, Carrier began operating an unlined lagoon for the purpose of containing clarifier sludges. TCE has been detected in the lagoon area. It appears that TCE from the lagoon area has leaked and contaminated the underlying groundwater. In November, 1980, Carrier removed all wastes and soils from the lagoon and transported them to a hazardous waste disposal facility. The lagoon was then filled with clean soil and vegetated.

- o Footnote "3" should be deleted from this page.

Page 4, Subparagraph 1

- o The last sentence, "These tests showed ... (MCLs).⁴" should be deleted.

Page 4, Subparagraph 2

- o The last sentence should be revised to state:

Some of those wells have shown measurable concentrations of TCE.

Page 5, Paragraph 2

- o The third sentence should be revised to state:

Sampling indicated amounts ... site.

- o The fourth sentence should be revised to state:

No contaminants ... Plant #2.

Page 5, Paragraph 3

- o The third sentence should be revised to state:

In September, 1989, ... Consent Order ... Study.

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III. COMMUNITY RELATIONS PROGRAM

A. OBJECTIVES OF COMMUNITY RELATIONS PROGRAM

Page 5, Paragraph 2, Subparagraph 1

- o The word "all" should be removed wherever used throughout the entire Plan. For example:

"Give residents and local officials advance notice of site-specific technical plans."

"Residents and local officials should ... plans."

B. COMMUNITY RELATION ACTIVITIES

Page 9, Paragraph 1, Subparagraph 1

- o The second sentence should be revised to state:

A minimum of two fact sheets ... intervals: before the RI initiation, and upon completion of the FS and Proposed Plan.

Page 9, Paragraph 1, Subparagraph 2

- o The first sentence should be revised to state:

A minimum of two public meetings ... to provide information about the upcoming site activities and on the completion of the FS and Proposed Plan to provide information on the Proposed Plan ... comments.

Page 10, Subparagraph 3

- o The subparagraph should be revised to state:

The public will be notified of the FS and Proposed Plan meeting by placing an advertisement in the local newspapers identified in Appendix B. News releases and/or advertisements will be prepared and distributed as needed throughout the remedial process.

Page 11, Subparagraph 2

- o The subparagraph, " Submittal of Responsive Summary ...", should be deleted.

Page 11, Subparagraph 3

- o The last sentence should be revised to state:

This list will be updated prior to each direct mailing by the RPM and/or CRC.

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C. SCHEDULE OF COMMUNITY RELATIONS ACTIVITIES

Placing newspaper ads announcing public meetings should only be mentioned as an activity under the completion of the FS. Upon completion of the RI, a public information meeting to summarize the findings of the RI is not necessary and should therefore be deleted from this section.

APPENDIX B

Page 17

D. U.S. Environmental Protection Agency

The following officials should be added to the list of contacts:

Carol Baschon, Assistant Regional Counsel
U.S. EPA Region IV
Office of Regional Counsel
345 Courtland Street, N.E.
Atlanta, GA 30365

Jim Doyle, TAG Specialist
U.S. EPA Region IV
Superfund Branch
345 Courtland Street, N.E.
Atlanta, GA 30365

Chuck Pietrosewicz, Environmental Public Health Official
Agency for Toxic Substances and Disease Registry
345 Courtland Street, N.E.
Atlanta, GA 30365

E. Local and State Agency Officials

The Tennessee Public Information person should be included on the list of contacts.

Page 18

G. Media

The contacts for the newspapers' environmental matters should be listed in the addresses.

Appendix C

Page 22

A. Administrative Record/Information Repository Location

The contact for the information repository/administrative record should be included in this section.

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Appendix E

Page 26, Paragraph 1

- o The third sentence should be revised to state:

Twenty percent of the requested ...

- o The following sentence should be changed to reflect the percentage change in the preceeding sentence.

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2.) COMMENTS ON THE DRAFT FACT SHEET

INTRODUCTION

Page 1, Paragraph 1

The first sentence should be revised to state:

On December 15, 1989, Carrier Air Conditioning (Carrier), under the oversight of the United States Environmental Protection Agency (EPA), has begun a long-term ...

BACKGROUND INFORMATION

Page 2, Paragraph 4, Subparagraph 1

The subparagraph should be revised to state:

In 1972, Carrier began operating an unlined lagoon for the purpose of containing clarifier sludges. TCE has been detected in the lagoon area. It appears that TCE from the lagoon area has leaked into and contaminated the underlying groundwater. In November, 1980, Carrier removed all visible wastes and soils from the lagoon and transported them to a hazardous waste disposal facility.

Page 2, Paragraph 2, Subparagraph 2

The last sentence, "The test results ... (MCLs).", should be deleted.

Page 3, Subparagraph 1

The last sentence should be revised to state:

Some of those wells were shown to contain concentrations of TCE.

Page 4, Paragraph 1

The third sentence should be revised to state:

In September, 1989, ... called a Consent Order ... begin.

An additional sentence should be added after the third sentence:

The Consent Order became effective December 15, 1990, which was the date of the approval of the RI/FS Work Plan.

In the body of this paragraph, it should be mentioned that Carrier has already performed work in order to protect public health.

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REMEDIAL INVESTIGATION

Page 4, Paragraph 2

In the body of this paragraph, it should be stated that work has been performed since mid-December because Carrier and EPA did not want to delay activities at the site.

The third sentence should be revised to state:

The purpose of the RI is to determine the extent of the contamination and potential risks to the public health and environment.

Page 4, Paragraph 3

Phase I activities have already been performed so the future tense used in describing Phase I activities is not applicable.

In the body of this section, the fact that there is an ongoing treatability study being conducted should be mentioned. A definition of treatability study should also be included.

WHAT HAPPENS NEXT

Page 5, Paragraph 2

The first sentence should be revised to state:

The results of the RI will indicate the extent of the threat to human health and environment from the site.

The second sentence should be revised to state:

Based on this information, Carrier will ...

GLOSSARY

Page 5, Paragraph 4

The third sentence should be revised to state:

During a process which can take many years, this water has the potential of providing a water source.

Page 6, Paragraph 1

A sentence should be added to the paragraph that states:

Not all contaminants have an established MCL.

Page 6, Paragraph 4

The RCRA definition may not be necessary if the only section in which it is cited is the Background Information

U.S. EPA'S SUPERFUND PROCESSPage 8, Paragraph 1

The first sentence should be revised to state:

After a site is listed, EPA or the responsible parties under EPA supervision develop a work plan ...

The fourth sentence should be revised to state:

When the study is completed, EPA or the responsible parties evaluate the alternatives identified and EPA recommends the best alternative for the site.

The "(5)" should be deleted from the sixth sentence.

Page 8, Paragraph 2

The second sentence should be revised to state:

... an RI/FS takes about 18 months.

TECHNICAL ASSISTANCE GRANTS AVAILABLEPage 9, Paragraph 1

The third sentence should be revised to state:

Twenty percent of the ...

The fourth sentence should also be revised to reflect the percentage change in the third sentence.

AVAILABLE INFORMATIONPage 10

The following EPA representative should also be contacted:

Michael Henderson
Community Relations Specialist
U.S. EPA
(404) 347-3004
or outside the state of Georgia 1-800-347-1754
or inside the state of Georgia 1-800-347-0289

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MAILING LIST ADDITIONS/CORRECTIONS

To be placed on the mailing list, the form should be mailed to:

Michael Henderson
Community Relations Specialist
U.S. EPA
345 Courtland Street, N.E.
Atlanta, Georgia 30365

The form should not be mailed to Elizabeth Brown.

3.) COMMENTS ON THE PUBLIC NOTICE

The Notice should be revised to state:

... THE INVESTIGATION OF POTENTIAL ENVIRONMENTAL HAZARDS ...

The last paragraph at the bottom of the notice should include a statement about citizens reviewing materials on site activities and being able to obtain the information from the repository and the location of the repository. Then state the contact information about Elizabeth Brown.

For Example: Interested citizens may obtain additional information about EPA and site related activities from the information repository located at _____ or contacting:

Elizabeth Brown
Remedial Project Manager
etc., etc., etc.